



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MKB:CAC/AL  
F.#2010R00735

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 22, 2010

**BY HAND DELIVERY AND ECF**

The Honorable Steven M. Gold  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Charles Nagel  
Criminal Docket No. 10-511 (JBW)

Dear Judge Gold:

The government submits its voir dire requests and a list of names and places that may be referenced at trial.

A. Voir Dire

The government respectfully requests that the Court ask potential jurors the following questions in addition to its customary voir dire questions:

1. Have you ever been accused of stalking or harassing someone? If so (at sidebar):

a. What was the nature of the accusation?

b. Were criminal charges filed?

c. What was the result of the accusation?

d. Would that experience cause you to sympathize with the defendant in this case?

2. Do you have any friends or relatives who have been accused of stalking or harassing someone? If so (at sidebar):

a. What was the nature of the accusation?

b. Were criminal charges filed?

c. What was the result of the accusation? \

d. Would that experience cause you to sympathize with the defendant in this case?

3. Do you believe that famous people should be treated differently with respect to unwarranted attention or contact?

4. Do you believe that harassment can be non-threatening in nature?

B. Names and Places That May Be Referenced at Trial

Names

1. Detective Brian Meichsner
2. John Marsh
3. FBI Special Agent John Sermons
4. Terry Kinney
5. Maeve Kinney
6. Katheryn Erbe
7. Jonathan Erbe
8. Jennifer Erbe Kennedy
9. Nancy Ann DiClemente
10. Joe Nuzzo
11. Steve Gamiello
12. Leslie Gyson
13. Jim Walters
14. Gregory Mantell
15. Felicia Franklin
16. Kimberly Taylor

- 17. Diana Son
- 18. Susan Olsen
- 19. Jerry Moynihan
- 20. FBI Special Agent Cari Robins
- 21. Michael Mosbach
- 22. Charles Nagel
- 23. Fay Weyman
- 24. Harleyquinn Nagel
- 25. Robert Datner
- 26. Allon Lifshitz (AUSA)
- 27. Celia Cohen (AUSA)
- 28. Margo Brodie (AUSA)

Places

- 29. 11124 Glenfield Street, Philadelphia, PA
- 30. 24 Horatio Street, New York, NY
- 31. 719 West 180<sup>th</sup> Street, New York, NY
- 32. Chelsea Piers, Pier 62, New York, NY

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

By: \_\_\_\_\_/s/

Allon Lifshitz  
Celia Cohen  
Assistant U.S. Attorneys  
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cc: Robert Datner, Esq. (ECF)